

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MARY LALIBERTE and MARIE MCKNIGHT, individually and as representatives of a class of similarly situated persons, on behalf of the QUANTA SERVICES, INC. 401(K) SAVINGS PLAN,

Plaintiffs,

V.

QUANTA SERVICES, INC.,

Defendant.

[illegible]

Case No: 4:22-cv-03290 (AHB)

**DECLARATION OF MATHEW J. MCKENNA IN SUPPORT OF
DEFENDANT’S OPPOSITION TO PLAINTIFFS’ MOTION FOR
CLASS CERTIFICATION**

I, Mathew J. McKenna, declare as follows:

1. I am an attorney with the law firm Morgan, Lewis & Bockius LLP, admitted to practice *pro hac vice* before this Court as counsel for Defendant Quanta Services, Inc. I submit this declaration in connection with Defendant's Opposition to Plaintiffs' Motion for Class Certification. In my capacity as an attorney with responsibility for the management of this litigation, I have personal knowledge of the information stated in this declaration.
2. Attached as **Exhibit A** is a true and correct copy of the 2020 Quanta Services, Inc. 401(k) Savings Plan Form 5500.
3. Attached as **Exhibit B** is a true and correct copy of Plaintiff Marie McKnight's Confidential Severance Agreement and Release of All Claims.
4. Attached as **Exhibit C** is a true and correct copy of Plaintiff Mary Laliberte's

Confidential Severance Agreement and Release of All Claims.

5. Attached as **Exhibit D** is a true and correct copy of the Expert Report of Dr. Adam Werner dated August 1, 2024, submitted by Plaintiffs in connection with this litigation.

6. Attached as **Exhibit E** are true and correct excerpts of the transcript of the deposition of Dr. Adam Werner taken on September 9, 2024.

7. Attached as **Exhibit F** is a true and correct excerpt of the transcript of the deposition of Plaintiff Marie McKnight taken on September 5, 2024.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 1st day of November, 2024, in Washington, DC.

/s/ Mathew J. McKenna
Mathew J. McKenna

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served via the Court's ECF/CM e-filing system to all counsel of record who are deemed to have consented to electronic service on November 1, 2024.

/s/ Jeremy P. Blumenfeld
Jeremy P. Blumenfeld